

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
EI PASO DIVISION**

BRANDON CALLIER, §  
§  
*Plaintiff,* § CASE NO. 3:21-CV-00015-DCG  
v. §  
§  
MCCARTHY LAW, PLLC, KEVIN §  
MCCARTHY, GOT LEADS 365, LLC, §  
IRSHAD HASAN, SMARTLEADS §  
MEDIA, LLC, and MICHAEL §  
GIANETTIA  
  
*Defendants.*

**DEFENDANT'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE**

Defendants SmartLeads Media, LLC and Michael Gianetti did not serve their “Motion to Dismiss Plaintiff’s Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(6)” (ECF No. 23) on Plaintiff Brandon Callier because a copy was mailed to the Plaintiff but that copy was not delivered by the United States Postal Service.

Parties have agreed to email as an agreed method of service. A copy of the Motion was served upon Plaintiff via email on October 6, 2021, after Plaintiff informed us that he had not received a copy of the Motion.

DATED: October 12, 2021

Respectfully Submitted,  
**JAFFER & ASSOCIATES PLLC**

/s/ Robert Leach.

**Shawn Jaffer**

Bar No.: 24107817

**Allen Robertson**

Bar No.: 24076655

**Robert Leach**

Bar No.: 24103582

8111 Lyndon B Johnson Fwy, Suite 350

Dallas, TX 75251

Phone: 214-494-1871

Fax: 888-530-3910

E-mail: attorneys@jaffer.law

*Attorneys for Defendants SmartLeads Media,  
LLC and Michael Gianetti*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served electronically on all counsel of record on this the 12<sup>th</sup> day of October, 2021.

/s/ Robert Leach  
Robert Leach